

# EXHIBIT 117

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Pursuant to 28 USC § 1746(2), Natalicia Tracy declares as follows:

1. I am Executive Director of the Brazilian Worker Center (BWC), in my current position since May 2010.
2. The Brazilian Worker Center maintains its principal office in the Allston neighborhood of Boston, Massachusetts. It also has a satellite office in Bridgeport, Connecticut.
3. The Brazilian Worker Center is a grassroots, community worker center that supports immigrants, both men and women, on issues of workplace and immigrant rights. Through organizing, advocacy, education, leadership training, capacity building, civic participation, and policy analysis we promote our community's exercise of its civil and human rights, and a more just society for all.
4. The Brazilian Worker Center receives over 5000 members of the community annually at our offices, and distributes information to another 8000 at community fairs, churches, and festivals.
5. The Brazilian Worker Center is incorporated as an independent non-profit corporation, within the Commonwealth of Massachusetts, governed by its own board of directors, and is not a branch of any larger state- or national-level organization.
5. The Brazilian Worker Center is a modest-sized community-based non-profit, with a FY 2017 annual operating budget of \$487,000. Our organization currently has ten paid employees: eight in Boston MA and two in Bridgeport CT. Together with board members and regular volunteer staff, the core organizational team is 36 individuals who are the principal actors who carry out the work of the organization.
6. Currently, four people within this core team have DACA designation, and within the families of the core team another 11 individuals also have DACA.
7. If all the individuals linked directly to our work lose their DACA status, it would create a great deal of harm and instability within our organization. Some individuals would lose their jobs, and their families would suffer from the loss in income from those losing their work permits. They would have increased difficulty in making payments on automobiles and homes they have purchased with the employment and earnings stability afforded them by DACA, and have to suspend degree programs they have begun at colleges and universities.
8. Loss of DACA would especially cut the number of outstanding college students from local universities who work with us as interns, or are otherwise active in our community and connect with our work. Some of them have DACA, and they are particularly effective working with our community because of their strong work ethic, leadership abilities, and their cultural and linguistic competence, as they have native proficiency in English as well as Portuguese.

9. As an example of the kind of dedicated young college student in our community that we are referring to, there is the example of Carlos (a pseudonym), who lives in Framingham, Massachusetts. In Fall 2015, he entered UMass Boston as a transfer community college graduate and chose Political Science as his major. He came to the United States from Brazil with his mother and little sister when he was nine years old in order to join his father, already here, and grew up and went to school in Marlborough. The family overstayed their visa, and became undocumented, and later his father was deported to Brazil. He graduated from high school in 2010, and like a lot of other undocumented high school students at the time, despaired of ever being able to afford college. One of his good friends in a similar situation at the time, 17 years old, committed suicide by hanging himself. To afford the tuition for evening classes at Mass Bay Community College, triple the regular in-state rates, he worked every day for 10 hours in a factory, feeding scrap metal into a grinder, and his mom cleaned houses without taking a day off for 10 years. In 2014, he received DACA designation, and was able to begin full-time studies at the University for the first time. He is an effective and dedicated leader active in several organizations on and off campus, as well.

10. Another example is Clara (a pseudonym), who is from Brockton. She came to the United States from Brazil when she was five years old, accompanying her mother, brother and sister, traveling over the Mexican border in order to join her father who was already working in Minnesota. She sees her mother as a “hero for striving for a better life for her children.” The family lived there for a year before moving to Brockton, Massachusetts, where she grew up and went to school. She was an excellent student, and the first in her family to finish high school, and to even think about college. She won an Abigail Adams scholarship when graduating from high school, but being undocumented was not able to collect it. By 2007 her family were detained and deported, when she wasn’t at home, and since then she has been alone, self-supporting and studying at UMass Boston, where the high costs have slowed her progress. At UMass Boston, also, she won a privately endowed merit scholarship, but the university’s rules did not allow her to use it because of her immigration status. Clara gained DACA status in 2013, and by then had become a noted leader in student and youth organizations on and off campus. In June 2013, she was one of four undocumented students who as part of the national United We Dream Network’s “Operation Butterfly” traveled to the Mexican border in Arizona and visited with their deported mothers through the border fence, an event which received wide national media attention at the time, and coverage in the documentary film, *Indivisible*.

11. The Brazilian Worker Center is also a membership organization, with 1168 members. We estimate that at least 60 people among this group and their families have DACA designation.

12. Cancellation of DACA will increase the sense of crisis and dislocation in the wider community that we serve, as DACA recipients lose privileges such as work permits, drivers’ licenses, and in Massachusetts and Connecticut, instate tuition rates at public institutions of higher education. This broader crisis would definitely create more workload for us to handle at the BWC, by bringing many families to us in crisis, and

needing our support to help them – even as our ranks of staff, board and volunteers are diminished through the loss of DACA for key personnel.

13. Cancellation of DACA would also create more impediments to members of our wider community contributing volunteer time, resources, and energy to BWC operations, including membership fees and engagement in public, civic activities.

14. In sum, all this would greatly increase our work as an organization, and harm us financially. With more families in crisis, there would be fewer individuals secure enough in their own and their family members' situations to invest in pursuing the Center's work, including engaging in civic activities. We would also as an organization lose the services of highly qualified, committed, outstanding employees who could no longer work with us, and incur extra costs in having to hire others to replace them. Cancellation of DACA would also reduce the number of our volunteers, upon whose dedicated labor we count on to supplement staff efforts.

15. I confirm that I have direct, personal knowledge of the facts attested to in this declaration, from my position as Executive Director of the Brazilian Worker Center for the last seven years.

I declare all the foregoing under the pains and penalty of perjury,



Natalia Tracy

Executed on this 26<sup>th</sup> day of September 2017